

EXHIBIT F

Maxwell Declaration

I, Deborah Dicks Maxwell, swear under penalty of perjury that the following information is true to the best of my knowledge and state as follows:

1. I am a resident of Wilmington, North Carolina in New Hanover county, where I have lived since 1992. I was born in Wilmington and previously resided there for approximately 15 years.
2. Since October 2021, I have served as President of the North Carolina State Conference of the National Association for the Advancement of Colored People (“North Carolina NAACP”), a state chapter of the National NAACP, which is a 501(c)(4) registered nonpartisan, nonprofit community organization dedicated to eliminating racial hatred and racial discrimination through education, advocacy, and litigation.
3. I have been a member of the NAACP for 25 years. Prior to my time as President, I served as Assistant Treasurer, Treasurer, Vice President, and President for the New Hanover County local branch of the North Carolina NAACP. I also served as the North Carolina State Conference District Director for Bladen, Brunswick, Columbus, New Hanover, Onslow and Pender Counties, which required me to oversee six counties in southeastern North Carolina.
4. As President of the North Carolina NAACP, I am responsible for communicating with NAACP branches across North Carolina, identifying matters of statewide concern, and taking steps to address members’ concerns. This can include, among other things, traveling to various parts of North Carolina for meetings and events, communicating statewide concerns to the National NAACP, advocating for or against proposed legislation or policies, making statewide programmatic decisions, and acting as a spokesperson for the North Carolina NAACP at public and private engagements.
5. I am personally knowledgeable of the facts contained herein.
6. I am authorized to speak for the NAACP in this matter.

NAACP Background

7. The mission of the NAACP is to eliminate racial hatred and racial discrimination. The North Carolina NAACP follows the national NAACP mission statement in focusing on political, educational, and other rights affecting all people and people of color. The national mission statement identifies the NAACP’s mission: “[T]o achieve equity, political rights, and social inclusion by advancing policies and practices that expand human and civil rights, eliminate discrimination, and accelerate the well-being, education, and economic security of Black people and all persons of color.”¹
8. The North Carolina NAACP engages in a wide variety of educational, advocacy, and legal work to ensure that communities of color and other marginalized communities throughout North Carolina are able to exercise the right to vote. This includes voter

¹See <https://ncnaACP.org/mission-vision/>.

registration, election protection, and voter mobilization events hosted by branches of the state conference. In addition, the North Carolina NAACP conducts voter education events and educational campaigns intended to inform voters about the requirements to register and vote, as well as any legal changes that might affect how, where, or when they are able to vote. This work is achieved through engagement with our members, who volunteer and organize events held both statewide and by local branches.

9. The North Carolina NAACP closely tracks every statewide redistricting process and engages in advocacy and legal efforts to prevent Black North Carolinians' votes from being diluted. Protecting our members and constituents, and Black voters generally, from vote dilution and being forced to vote under discriminatory voting plans is central to achieving our core missions and ensuring that Black voters have the opportunity to elect candidates of their choice. We carefully tracked the 2023 redistricting process, including the public hearings in September of 2023 and the legislative process in October of 2023.

North Carolina NAACP Membership

10. National NAACP membership compliance standards require a NAACP state conference to have six adult branches and six youth branches.² The North Carolina NAACP has 70 adult branches and numerous students and youth branches, composed of well over 10,000 members.
11. To become a member of a branch of the North Carolina NAACP, an individual must sign a form affirming that they live or work in the county in which they wish to join a chapter and agree to pay dues. Lifetime membership is maintained with a one-time payment of dues. To maintain yearly membership with the North Carolina NAACP, members must pay yearly dues in the amount of thirty dollars for adults and ten dollars for youth.
12. North Carolina NAACP membership is predominately Black and other minority individuals and includes registered voters who reside throughout the state.
13. NAACP membership lists and information are very protected from public disclosure. For example, access to membership lists and other information is strictly regulated and limited even within the NAACP. This is due to privacy concerns and the risk of retaliation against members following a longstanding history of loss of life and livelihood as retaliation for civil rights activism in the South. This retaliation has included death threats and the bombing of a former North Carolina NAACP President's home.³ That membership lists and information remain confidential within the organization is crucial to the NAACP's ability to protect its members from retaliation harassment, and to maintain its membership and also recruit members in the future. I am aware of current members that would fear they are personally at risk if their membership in the NAACP were

² See

<https://naacp.org/convention/faqs#:~:text=Financial%20compliance%20consists%20of%20submitting%20the%20Annual%20Financial%20Report%20and,does%20ACT%2DSO%20stand%20for?>

³ See <https://ncnaacp.org/history/>.

publicly disclosed without their consent or knowledge. The NAACP has a long tradition of not disclosing, and of safeguarding, membership information to protect our members.

14. I believe if the North Carolina NAACP were forced to disclose its North Carolina membership information, this would have a severe adverse impact on its ability to maintain current members and recruit new members in the future. Because the work to achieve our core missions is largely carried out through our members, this in turn would severely diminish our ability to carry out those activities central to our objectives and mission.
15. The North Carolina NAACP has brought this lawsuit on behalf of its members, both because achieving constitutional and lawful voting plans is central to our mission and would benefit those members directly, and also because participating in this lawsuit is too burdensome for many of the NAACP members who are harmed by discriminatory voting plans. I have worked with my leadership team and, with the assistance of counsel, confirmed that we have at least one member of the North Carolina NAACP who is a registered voter that self-identifies as Black or African American residing in the impacted areas we are challenging in this lawsuit, and specifically at least 2023 Senate Plan districts 1, 2, 8 & 41; 2023 House Plan districts 5, 8, 9, 10, 12, 23, 24, 25, 27, 32, 37 & 71; and 2023 Congressional Plan districts 1, 3, 5, 6 & 10. This includes members who identify as Black or African American and are registered voters in the following counties: Vance County; Warren County; Halifax County; Northampton County; Hertford County; Gates County; Pasquotank County; Bertie County; Nash County; Wilson County; Edgecombe County; Martin County; Pitt County; Greene County; Lenoir County; Wayne County; New Hanover County; Mecklenburg County; Wake County; and Forsyth County.
16. These areas are far from the only areas in which we have members in North Carolina. If needed to maintain standing in this lawsuit, I could work to identify members living in additional areas of the state who are registered voters and self-identify as Black or African American.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Executed on: September 23, 2024.


Deborah Dicks Maxwell